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**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

THE PEOPLE OF THE STATE OF  
CALIFORNIA, by and through Dawyn R.  
Harrison, County Counsel for the County of  
Los Angeles, and THE COUNTY OF LOS  
ANGELES,

Plaintiffs,

v.

CHIQUITA CANYON, LLC, a Delaware  
limited liability company; CHIQUITA  
CANYON, INC., a Delaware corporation;  
WASTE CONNECTIONS US, INC., a  
Delaware corporation; and DOES 1-50,  
inclusive,

Defendants.

Case No. 2:24-cv-10819-MEMF (MARx)  
Related Case: 2:23-cv-08380-MEMF (MARx)

Hon. Maame Ewusi-Mensah Frimpong

**JOINT STATUS REPORT RE JUDICIAL  
SITE VISIT**

Action Filed: December 16, 2024  
Trial Date: None Set

1 **I. INTRODUCTION**

2 Pursuant to this Court's order [DKT 66], the Parties in the instant case and the Lead Case  
3 have met and conferred regarding the Judicial Site Visit to the Chiquita Canyon Landfill, and have  
4 discussed dates and times for a visit, certain logistics, and some potential stops for an itinerary.

5 The Parties also request this Court's permission to invite Judge Daniel Buckley, Special  
6 Master in these cases, to attend the site visit as well.

7 **II. POTENTIAL DATES FOR A SITE VISIT**

8 The Chiquita Canyon Defendants have offered certain dates that they can make the  
9 Landfill available for a site visit: June 25 or 26; June 30-July 2; or July 7-11, 2025. They advise  
10 that from an operational perspective, they would prefer that the onsite portion of the visit begin at  
11 or after 10:30 a.m. so as not to interfere with daily operations, including daily safety meetings that  
12 take place in the mornings for the on-site team and the period when there is increased site traffic.  
13 Chiquita Canyon Defendants will provide shade tents and water at all stops at the Landfill for  
14 safety and comfort. Should the Court prefer a different time, the Chiquita Canyon Defendants will  
15 attempt to accommodate. The Parties expect that the site visit will last 1-2 hours, with  
16 approximately 1 hour on site and additional time at community locations.

17 County Plaintiffs and Private Plaintiffs note that this site visit will likely take place in June  
18 or July, making the mid-day heat a factor to consider in any site visit. County Plaintiffs further  
19 note that the Conditional Use Permit under which the Landfill operates allows daily operations for  
20 site preparation and maintenance activities Monday through Saturday from 4:00 a.m. to 7:00 p.m.  
21 As the community generally reports odors early in the morning (*i.e.*, between 5:00 a.m. and 9:00  
22 a.m.) and late in the day (from 6:00 p.m. to 10:00 p.m. or even later), a visit in the early morning  
23 may be appropriate.

24 **III. PRELIMINARY LOGISTICAL ISSUES**

25 The Chiquita Canyon Defendants have advised that they can accommodate three vehicles  
26 only, with a maximum of 20 attendees. The Chiquita Canyon Defendants therefore propose that  
27 the Court and Court staff bring one vehicle, and the Plaintiffs share a second, while defendants  
28 share a third vehicle. The Chiquita Canyon Defendants recommend a vehicle with four-wheel

1 drive as not all roads at the Landfill are paved and there are steep grades. Each group should  
2 provide its own vehicle, and the Parties can coordinate to provide a vehicle and driver for the  
3 Court and Court staff.

4 The Chiquita Canyon Defendants advise that they will provide safety vests for each  
5 participant. Should the itinerary the Parties agree on require additional, different Personal  
6 Protective Equipment, the Parties will meet and confer on that issue. For clothing, the Chiquita  
7 Canyon Defendants recommend closed-toe shoes (it is not necessary to wear steel-toed boots),  
8 long pants, and comfortable clothing suitable for something like a construction site. During the  
9 visit, all visitors must sign in and attend an initial safety briefing before embarking on the visit.

10 **IV. PROPOSED NEXT STEPS**

11 The Parties request that the Court identify the date and time of the Site Visit to allow for  
12 further planning; that the Court provide the estimated number of Court-related attendees; that the  
13 Court notify the Parties of any specific locations it would like included in the site visit, if any; and  
14 confirm whether Judge Daniel Buckley, Special Master, may also be invited. The Parties will  
15 continue to meet and confer regarding an itinerary and a detailed protocol for the site visit. The  
16 Parties anticipate that they can provide such by June 24, 2025.

1 DATED: June 16, 2025

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**ATTESTATION**

Pursuant to Civil L.R. 5-4.3.4(a)(2)(1), I attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

DATED: June 16, 2025

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